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March 18, 2023

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. Aimee Harris
22 Cr. 457 (LTS)

Dear Judge Swain:

By this letter, I respectfully request that a conference be held in order to address and resolve existing representation issues. I also respectfully request that, should the Court schedule a conference, Ms. Harris be permitted to appear by video. She lives and is on pretrial supervision in Florida and travel to New York, especially on short notice, would be financially and personally burdensome. The government, by Assistant United States Attorney Robert Sobelman, consents to the scheduling of a hearing, takes no position as to any representation issues but objects to Ms. Harris not appearing at the requested conference in person.

Thank you for Your Honor's consideration of these applications.

Very truly yours,

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Sanford Talkin

cc: AUSA Robert Sobelman (by ECF)